

ORIGINAL

MAR 17 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM Docket No. 97-252

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SUMMARY

The proposal to allot a new FM channel to "Columbia City", Florida, must be rejected because the proponent has failed to demonstrate that such a community exists. No geographic, demographic, governmental, commercial, social, civic or other evidence of the existence of such a community has been offered by the petitioner, either in its original petition for rule making or in its Comments. Indeed, as Dickerson Broadcasting, Inc. ("Dickerson") itself demonstrated in its Comments, Opposition and Counter-Proposal filed herein, there is no such community.

While the petitioner does offer bits and pieces of information about certain aspects of Columbia County, Florida, that information is neither consistent nor completely accurate, as demonstrated herein by Dickerson. In sum, as Dickerson has previously argued, the petitioner has failed to establish that there is a "Columbia City" to which any FM channel can be allotted.

In addition, in its Reply Comments Dickerson also provides information concerning developments which bear on its counterproposal herein.

1. Dickerson Broadcasting, Inc. ("Dickerson") hereby submits its Reply Comments relative to the Comments filed by Max Media in the above-captioned proceeding. As set forth below, Max Media has failed to establish that Columbia City is in fact a community for channel allotment purposes. Additionally, Dickerson provides herein some supplemental information concerning developments which have come to its attention since the submission of its counterproposal.

Max Media's Materials Do Not Establish That "Columbia City" Is A Community For Allotment Purposes.

2. In an effort to create the impression that there exists something called "Columbia City", Max Media has served up a substantial volume of materials which, upon even cursory inspection, fall far short of their intended mark. A threshold problem underlying, and undermining, all of Max Media's materials is the fact that Max Media is completely unable to show what the boundaries of its "Columbia City" are. As Dickerson noted in its initial Comments, Opposition and Counter-Proposal filed herein, there is no "Columbia City" -- no city government, no city services, no city boundaries, no library, no shopping center, no recreational facilities, no social or civic organizations. The most that can be said is that there are two signs on Route 47, located two-fifths of a mile apart, each of which states merely "Columbia City" -- not "entering Columbia City" or "leaving Columbia City" or "Welcome to Columbia City" or anything else. Also as Dickerson pointed out in its Comments, those signs were placed there not by any organized community in the area, but rather by the Florida Department of Transportation to "identify

an area".

3. While Max Media serves up several suggestions for where it might like "Columbia City" to be, those suggestions are unsupported and, in fact, tend to be inconsistent with one another. For example, Max Media cites population "data from Scan/US, Inc." relative to the "Columbia City area". Max Media Comments at 5, Exhibit 11. For openers, even Max Media seems to acknowledge that there is no "Columbia City" but, at most, something which may be referred to as the "Columbia City area". That is inadequate for allotment purposes, as the Commission allots channels to identifiable communities, not to areas.

4. Moreover, the "area" covered by the Scan/US study was limited to a three-mile radius from a particular church which is located (at least according to its own letterhead) in Lake City, not Columbia City. How and why that particular area was chosen is not clear, but there is no reason to believe that that area constitutes any community definable as "Columbia City" -- particularly since the center point of the area is viewed by its resident as a "Lake City" address. ^{1/}

5. In addition to the Exhibit 11/within-three-miles-of-a-church suggestion, Max Media also seems to suggest that "Columbia City" is coterminous with the "attendance zone for Columbia City Elementary School". Max Media Comments at 6, Exhibit 12. The

^{1/} As for the population statistics set forth in Max Media's Exhibit 11, they reflect actual statistics only through 1990. The 1993 figures are only estimates, and the 1998 figures are only projections. Thus, even if the Commission had any idea of the precise metes and bounds of the supposed "Columbia City", it would still not have any solid population information.

trouble with that is that that particular "measure" extends far beyond the "three-mile-radius-of-the-church" measure. Indeed, the "attendance zone" appears to comprise somewhere between 25%-33% of the entirety of Columbia County! ^{2/}

6. Even Max Media appears not inclined to accept that last "measure". Elsewhere in its Comments, Max Media refers to the "number of registered voters in the Columbia City community". Max Media Comments at 5. For that statistic it refers to figures supplied by Carolyn D. Kirby, Supervisor of Elections for Columbia County. Ms. Kirby's statistics are titled "GROWTH IN COLUMBIA CITY AREA per ELECTION PRECINCTS for that area". Max Media, Exhibit 12. Immediately under that heading Ms. Kirby lists five separate voting precincts (Nos. 1, 18, 19, 28 and 30), and provides a map with those five precincts clearly delineated. A review of that map indicates that the area covered by the five precincts appears to be the same as that covered by the school "attendance zone". From Ms. Kirby's presentation, then, it appears that she believes that the "Columbia City area" includes all of the "attendance zone".

7. But in its own discussion of Ms. Kirby's statistics, Max Media advises that "Columbia City straddles [sic] the junction of three Columbia County precincts -- numbers 1, 19 and 30." Max Media Comments at 5. So Max Media does not believe that "Columbia City" is coterminous with the "attendance zone",

^{2/} The extent of this "attendance zone" is not surprising in view of the fact that the school is just one part of the county system, owned and administered by the county. See Dickerson Comments, Attachment B.

although Max Media offers no explanation for its failure to include all five of the precincts listed by Ms. Kirby. Similarly, Max Media does not offer any clue as to exactly how much of any of the three Columbia County precincts it is willing to include may be "straddled" by "Columbia City". So the Commission is still left without any information about exactly where "Columbia City" starts and ends, or how many people it may contain.

8. Without any definition of the boundaries of "Columbia City", the various statistics served up by Max Media are meaningless. For example, Ms. Kirby's voting statistics cannot be used, since the Commission has no way of knowing how many voters from each precinct could be deemed residents of "Columbia City", since the Commission still has no way of knowing where "Columbia City" might be or how much of "Columbia City" straddles any particular precinct. Similarly, with an "attendance zone" spanning the southwest quarter of the county, it is not surprising that the Columbia City Elementary School has a substantial student body, or that a number of building permits have been issued in that area. See Max Media Comments at 6. But as Dickerson has previously demonstrated, the Columbia City Elementary School is part of the Columbia County school system and is administered by Columbia County. There is no indication that that school is particularly local or serves to define any local community.

9. Even the Columbia City Elementary School appears to concur with this observation. The school's Assistant Principal

provided Max Media with a letter on school letterhead. See Max Media Comments, Exhibit 2. That letterhead reflects that the school is actually located in "Lake City". Moreover, the letter itself seems to distinguish between the school's "large attendance zone", on the one hand, and "the community of Columbia City", on the other. While the latter is not defined at all in the letter (other than by a suggestion that it may involve a radius of "a few miles of the school"), it is clear that the total "attendance zone" plainly exceeds the notion of "Columbia City", whatever that notion may entail.

10. In its Comments, Max Media does provide a list of 28 companies or organizations which are, according to Max Media, "a part of the Columbia City community". But of these, the following can accurately be said:

- As Dickerson has previously demonstrated, the Columbia City Elementary School and the Columbia City Volunteer Fire Department are services provided and administered by Columbia County, not by any separate and independent "Columbia City". Indeed, even the letterheads of both the school and the fire department clearly reflect "Lake City" as the address of each. See Max Media Comments, Exhibits 2 and 3. This does not support the notion that there is, objectively or subjectively, some "Columbia City" which exists separate and apart from the rest of Columbia County.
- Dickerson has obtained materials from a number of the businesses listed by Max Media as being part of "Columbia City". As may be seen in Attachments A and B hereto, business cards, letterheads, truck signage and other materials from Meeks Payday Feed and Seed, B&H Woodworks, Dana's Restaurant, Motel 8, Chevron Food Mart and Service Station, Our Redeemer Lutheran Church and Pleasant Grove United Methodist Church all reflect addresses in Lake City, not "Columbia City". While Max Media may wish to entertain the fancy that all these establishments comprise one big happy "Columbia City" family, the fact that these establishments have chosen to list "Lake City" -- and not "Columbia City" --

addresses on their own materials flatly contradicts Max Media's wishful thinking.

- Additionally, 11 of the businesses listed are in fact located not near the two "Columbia City" signs (at the intersection of Route 47 and County Road 240), but rather at or immediately near the interchange of Interstate 75 and Route 47, some four miles away. Interstate 75 is a major interstate highway, and Route 47 is a well-travelled state highway. It is therefore not at all surprising to find, at the interchange between the two, several gas station/motel/restaurant islands serving travellers. The S&S Food Store and Service Station #1, T-Roy's Restaurant, the Subway Restaurant, Dana's Restaurant, the Stop-n-Go Food Store and Service Station, the Motel 8, the Amoco Food Store and Service Station, the Chevron Food Store and Service Station, and the Little Caesar's Restaurant are all located at the I-75/Route 47 interchange, several miles from the "Columbia City" signs. As can be seen from the photographs included in Attachment B hereto, these various businesses are little more than adjuncts to the nearby highways, designed to serve the needs of travellers more than the needs of any local residents. If such establishments are deemed to constitute "communities" for allotment purposes, then the Commission will have to begin allotting channels to rest areas on the New Jersey Turnpike.^{3/}

11. When these various considerations are taken into account, we are left with two generic gas station/convenience stores ("B&B" and "S&S"), a peanut seller ("Red's Peanuts"), one

^{3/} While Max Media lists the various businesses separately, Dickerson has observed that the businesses located at the I-75/Route 47 interchange tend to be co-located, much like a service plaza on a turnpike. For example, the Little Caesar's Restaurant and Chevron Food Mart and Service Station are located in the same relatively small building. And the Rally convenience store, Express gas station and Subway Restaurant are co-located in the same immediate vicinity. And an Amoco gas station and convenience store are also co-located in that same immediate vicinity. And the Super 8 Motel is co-located with Dana's Restaurant, at the interchange. Similarly, the Stop-n-Go Food Store and Service Station, T-Roy's Restaurant and the Motel 8 are all co-located approximately one-fifth of a mile south of I-75. See Attachment B hereto. The TNT Golf and Games is located within approximately one mile of the interchange.

relatively small woodworking company ("B&H Woodworks"), one daycare operation of unspecified size ("Ms. Bobbie's Flutterby Child Care Center"), and one church (New Mt. Zion United Methodist) physically located between the "Columbia City" signs - - and at least one of those, B&H Woodworks, lists its own address as "Lake City".

12. Max Media also offers a number of statements from various individuals in an effort to shore up its claim about the existence of "Columbia City". That effort fails as well. Exhibits 2 and 3 consist of letters relative to, respectively, the Columbia City Elementary School and Columbia City Volunteer Fire Department. As noted above, however, the letterheads of both of these letters reflect "Lake City" addresses. Moreover, neither letter provides any specific indication of where "Columbia City" actually is or how its boundaries are defined. Additionally, neither letter acknowledges the fact that Columbia County, and not anything called "Columbia City", is responsible for the school and the facilities of the fire department.

13. Exhibits 4 and 5 are letters from the Pastors of, respectively, Our Redeemer Lutheran Church and Pleasant Grove United Methodist Church. But the letterheads of both churches reflect that they are located in Lake City. The letters similarly fail to identify any boundaries or other defining elements of "Columbia City", referring instead to "the Columbia City area".

14. Exhibit 7 is a letter from the owner of T-Roy's Restaurant, the letterhead of which confirms both the location of

that establishment at "Hwy 47 and I-75" and the fact that it serves "traffic on highway 47 and I-75".

15. Exhibit 8 is a letter from the proprietor of "Ms. Bobbie's Flutterby Child Care Center". While she states that all of her "patrons" live in "Columbia City", she does not indicate how many "patrons" there may be or where, exactly, she understands "Columbia City" to be.

16. Exhibit 9 is a pre-fab, fill-in-the-blank "declaration" of Gary Meeks of the Payday Feed and Seed which appears to be intended to show that Mr. Meeks conducts business in "Columbia City". But according to the sign on the side of Mr. Meeks' truck, and according to his business card, his business is located in Lake City. See Attachment B hereto. In light of that documentary evidence, the "declaration" provided by Max Media cannot be credited.

17. Exhibit 10 consists of approximately 80 more of the pre-fab, fill-in-the-blank "declarations" from various individuals who Max Media would have the Commission believe are residents of "Columbia City". While the pre-typed verbiage (prepared, Dickerson assumes, by Max Media) boldly asserts that the signer of each declaration believes that "Columbia City is a local center of commerce and society", the hand-written additions tell a different story. More than 20 of these "declarations" include hand-written address information reflecting that the declarant lives not in "Columbia City", but in "Lake City"

(apparently abbreviated in some of the declarations as "L.C."). ^{4/}

18. Moreover, some of the individuals identifying their addresses as "Lake City" also provided street names which correspond to the street names listed for other declarants who had not specifically listed their community. For example, of the nine declarants who indicated residence on "Twig Lane", three specifically stated that their addresses were in "Lake City" (or "L.C."). Two of the three declarants listing "Summerhill Road" as their residence similarly identified that as a "Lake City" address. And six of the 20 declarants who listed an address on Route 14 (or some variation of that address) identified their addresses as Lake City addresses. If the individuals who listed these street addresses as being in Lake City were correct, then presumably the other individuals on those streets are also in Lake City. In any event, it can safely be concluded that, contrary to the pre-typed language presumably provided self-servingly by Max Media, the hand-written information provided by many, if not most, of the declarants tends to establish that they view themselves to have Lake City addresses.

19. Indeed, two persons -- Florence C. Reagan and Gerald F. Reagan -- who specifically indicated their addresses to be on the

^{4/} While the spelling of some of the hand-written names is somewhat difficult to decipher, the names in question appear to be: Tommy Hudson; Armando Burciaga; Ronnie K. Edendfield, Sr.; Nora Selgas; Roy Dixon; Clarence Chance; Tera Perry; Margaret Grice; Karen Krummrich; Rose E. Grief; Randall Baldwin; Mattie Florence; Billy Williams; Pat Williams; Dorothy Williams; Wendell Stacy Oliver; Joe Weatherspoon; Deborah Weatherspoon; Florence Reagan; Gerald F. Reagan; Sibyl King.

corner of State Road 47 and County Road 240 identified that as a Lake City address. This is especially significant since that intersection lies between the "Columbia City" signs on State Road 47. In other words, if there could, arguendo, be said to be a "Columbia City" at all, that intersection would presumably be at the center of it -- and yet, the two individuals who reside at that precise spot apparently view themselves to have a Lake City address!

20. The various "declarations" also confirm the total lack of any significant commercial activity in the supposed "Columbia City" area. Max Media's "declaration" form invited the declarants to provide a listing of the local businesses the declarants "use/attend/participate in". In response, some 53 of the 83 or so declarants listed only one or both of the gas station/convenience stores in response to this invitation. One declarant provided no response at all to this blank, and one indicated that he shops in Lake City stores. Thus, the overwhelming majority of Max Media's own declarants demonstrate that, notwithstanding Max Media's efforts, the "Columbia City" area is nothing more than a crossroads featuring, not surprisingly, two generic gas stations with associated convenience stores.

21. Exhibits 11, 12, 14 are addressed in detail above.

22. Exhibit 13 is a letter from the Executive Director of the Columbia County Chamber of Commerce which is limited for the most part to a description of county-wide development. To the limited extent that this letter mentions "Columbia City", it

refers to "the Columbia City area" and then the reference is largely limited to the elementary school which, as Dickerson has already demonstrated, is a county school with an "attendance zone" extending across 25%-30% of the county, far beyond what even Max Media would claim to be "Columbia City".

23. Exhibit 15 is a letter from Dale Williams, the County Coordinator of the Columbia County Board of County Commissioners. This letter is particularly unhelpful to Max Media, as Mr. Williams consistently refers to "Columbia City" as an "area within Columbia County", and not as a separate identifiable community. Moreover, while Mr. Williams's letter includes statistics concerning building permits issued from 1993-1997, the geographical area covered by those statistics appears again to be the "attendance zone" of the elementary school, an area which (as discussed above) cannot legitimately describe "Columbia City" even by Max Media's own admission.

24. Exhibit 16 consists of a letter from the Lake City Postmaster concerning the 32024 zip code. While the letter suggests that the Post Office may recognize something called the "Columbia City Community delivery area", the accompanying "Map B" clearly indicates that the 32024 zip code is a Lake City zip code. Moreover, the map itself is little more than a variation of the attendance zone map for the elementary school, covering substantial portions of the southwest quadrant of Columbia County far beyond what Max Media itself seems to claim as "Columbia City".

25. Finally, Exhibit 17 consists of two charts labelled

"Traffic Trends". The precise meaning of these charts is far from clear from the limited information provided on the charts. Max Media claims that these charts show the "traffic on the main thoroughfare through Columbia City". But that "main thoroughfare" is a well-travelled state road (State Route 47). One would therefore normally expect a significant amount of traffic on that road whether or not there is any "Columbia City" along the side of the road. Thus, even if the raw traffic statistics provided by Max Media were reasonably capable of being interpreted (and Dickerson does not believe that they are, in view of the near-total lack of accompanying explanation of the charts), all those statistics would show would be the number of cars driving up and down Route 47. They would not provide any information at all to support Max Media's notion that there exists an identifiable community of "Columbia City" at some unidentified point along the side of that road.

26. In summary, Max Media has failed to demonstrate that "Columbia City" in fact exists as a separate, geographically- or socially-identifiable, entity. To the contrary, it is clear even from Max Media's own showing that "Columbia City" is at most a generalized area within Columbia County, an area which does not feature any of the attributes which comprise a "community" for FM channel allotment purposes: there are no social or civic organizations, no governmental organizations or services, no shopping centers, recreational facilities, libraries, etc. Accordingly, Max Media's proposal must be rejected. See, e.g., Hayfield, Virginia, 12 FCC Rcd 16373 (Allocations Branch 1997).

Dickerson's Counterproposal


27. Since the submission of Dickerson's counterproposal herein, two developments have come to Dickerson's attention. First, Dickerson has counterproposed the substitution of channels for Station WDFL(FM), Cross City, Florida. Recently, Dickerson learned that that station has already been ordered by the Commission to vacate its previous channel (Channel 292A) and to relocate on an interim basis to Channel 295A, and Station WDFL(FM) has voluntarily acquiesced in that relocation. See Letter (December 18, 1997) from Dennis William, Assistant Chief, Audio Services Division, to John J. McVeigh, Esquire, et al. (re Station WLVO(FM), BMPH-970527ID). As a result, it is clear that Dickerson's counterproposal cannot be said to be the causative factor of any relocation of Station WDFL(FM) from Channel 292A, since that relocation has already occurred irrespective of Dickerson's counterproposal. This reinforces Dickerson's position (articulated in its counterproposal) that Dickerson should not be required to reimburse Station WDFL(FM) for any expenses incurred in moving off of Channel 292A. And since it is clear that Station WDFL(FM)'s current placement on Channel 295A is on an interim basis only, it is clear that relocation from that channel is already contemplated and Dickerson cannot reasonably be expected to reimburse the station for any such further relocation.

28. Dickerson also notes that a recent counterproposal in MM Docket No. 97-239 (Otter Creek, Florida) would allot Channel 240C3 to Horseshoe Beach, Florida. That counterproposal

would not be mutually exclusive with Dickerson's counterproposal in the instant proceeding as long as the Horseshoe Beach allotment were to be subject to a reasonable site limitation. ^{5/}

WHEREFORE, for the reasons stated, Dickerson Broadcasting, Inc. submits that proposal to allot a channel to "Columbia City" should be rejected and that, instead, Dickerson's counterproposal should be adopted.

Respectfully submitted,


/s/ Harry F. Cole
Harry F. Cole

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Counsel for Dickerson Broadcasting, Inc.

March 17, 1998

^{5/} In addition, Dickerson has noticed a limited number of minor typographical errors in the engineering statement accompanying its original counterproposal. Revised pages correcting those errors are included as Attachment C hereto.

ATTACHMENT A

DECLARATION

Benjamin Dickerson, under penalty of perjury, hereby declares the following to be true and correct:

1. I am an officer, director and shareholder of Dickerson Broadcasting, Inc. ("DBI"), the licensee of Station WEAG-FM, Starke, Florida. I am preparing this Declaration for submission to the Federal Communications Commission ("Commission") in connection with DBI's Reply Comments with respect to a proposal to allot Channel 243A to "Columbia City", Florida.

2. I have reviewed the Comments submitted by Max Media relative to its proposal to allot Channel 243A to "Columbia City". As I have previously stated, to the best of my knowledge, there is no community of "Columbia City". However, in light of Max Media's Comments, I visited the area identified in those Comments as "Columbia City" and attempted to verify the accuracy of Max Media's claims.

3. Max Media claims that as many as 28 separate businesses are located in "Columbia City". During my visit to the area, I obtained documentation establishing that most of the businesses listed by Max Media are, in fact, not properly identified as "Columbia City" businesses. I obtained:

- (a) from Meeks seed company, a business card showing a Lake City address; I also took a photograph of the Meeks' company truck, which includes, painted on the door, "Lake City, Florida";
- (b) from B&H Woodworks, a business card showing a Lake City address;
- (c) from Dana's Restaurant, a business card showing a

- 2 -

Lake City address (and, from the co-located Super 8 Motel, a business card also showing a Lake City address);

- (d) from the Motel 8 (located at the I-75/State Road 47 interchange), a pre-stamped receipt showing a Lake City address;
- (e) from the Chevron gas station and co-located Hunter Food Store (#47), a credit card application card bearing the dealer stamp and station number, which stamp shows a Lake City Address.

4. In addition, during my visit I determined that a number of the businesses listed by Max Media as being in "Columbia City" are in fact nothing more than travellers' service centers located at the intersection of Interstate Route 75 and State Road 47 (a well-travelled state highway). That interchange is approximately four miles from the intersection of State Road 47 and County Road 240, which Max Media suggests should be deemed the site of "Columbia City". The businesses located at or within the immediate vicinity of that interchange include:

- (a) a co-located Amoco gas station and convenience store;
- (b) a co-located Little Caesar's Restaurant and Chevron Food Mart and gas station;
- (c) a co-located Rally convenience store, Express gas station and Subway Restaurant;
- (d) a co-located Stop-n-Go Food Store and Service Station, T-Roy's Restaurant and Motel 8;
- (e) a co-located Super 8 Motel and Dana's Restaurant;
- (f) an S&S convenience store (#41)

I also found TNT Miniature Golf and Games approximately one mile from the I-75/Route 47 interchange.

- 3 -

5. I am submitting, as further attachments to DBI's Reply Comments, copies of the documentation and photographs which I obtained to support my personal observations.

Benjamin Dickerson
Benjamin Dickerson

Date: March 17, 1998

ATTACHMENT B

ATTACHMENT B

Item No. 1: Business card from Meeks Grain & Milling, Inc.
listing Lake City address

Meeks Grain & Milling, Inc.

~~Route 2, Box 187A~~ Phone 752-4901

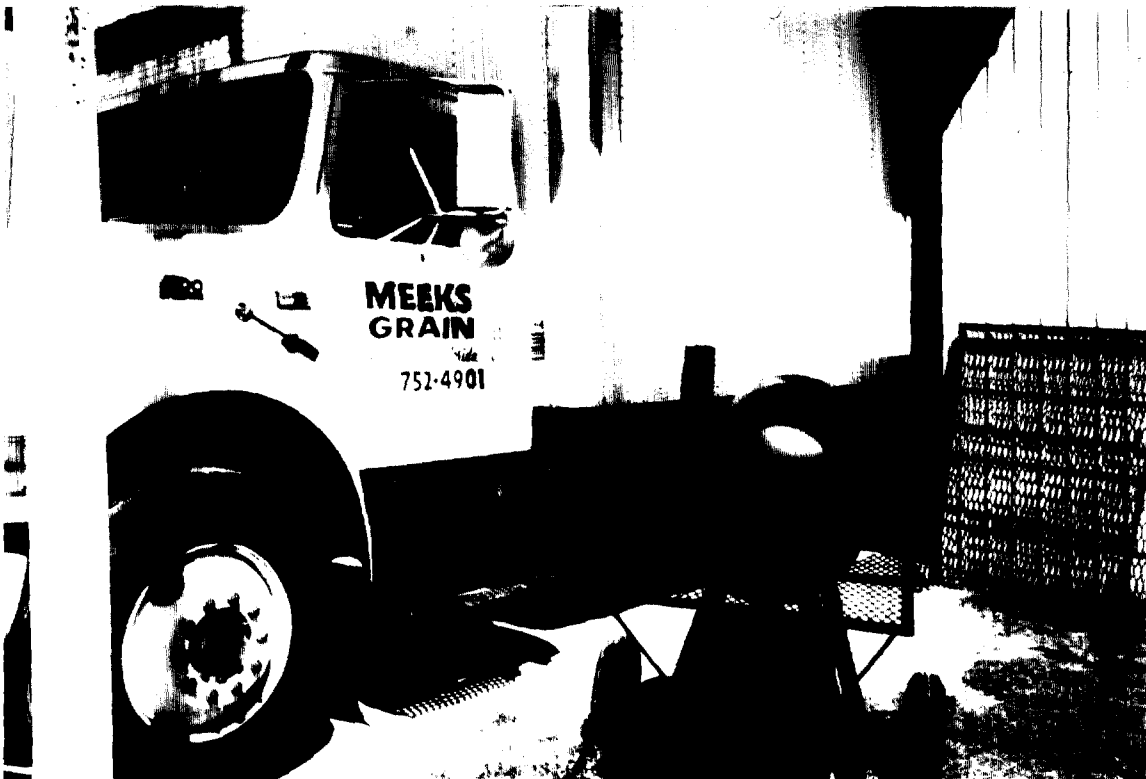
Lake City, Florida ~~32025~~ 32024

17 + 14 51 + 2435

LEON MEEKS

GARY MEEKS

Item No. 2: Photograph of Meeks Grain truck with "Lake City,
Florida" painted on door



Item No. 3: Business card from B&H Woodworks listing Lake City address

B & H WOODWORKS

"Millwork & Stair Manufacturers"

Jim Huffman, Sr.

(904) 755-2556
1-800-226-2556
(904) 755-1725 (FAX #)

Rt. 14, Box 514
Lake City, FL 32055

1

Item No. 4: Business card from Dana's Restaurant listing Lake City address

Dana's
FAMILY DINING & LOUNGE
Steaks ~ Seafood ~ Pasta

SR 47 & I-75 - Exit 81
Rt. 15, Box 3007
Lake City, FL 32024

(904) 719-6499
Fax (904) 719-6496

Catering Available

Item No. 5: Business card from Super 8 Motel (co-located with Dana's Restaurant) listing Lake City address



Margaret S. Stepp
Manager

SUPER 8 MOTEL - LAKE CITY
I-75 and State Road 47, P.O. Box 7094
Lake City, FL 32055 • Bus: (904) 752-6450

America's Finest Economy Lodging.

For Toll Free Reservations: 1-800-800-8000

This property is owned and operated pursuant to a franchise agreement with SUPER 8 MOTELS INC.

Item No. 6: Pre-stamped receipt from Motel 8 listing Lake City address

MOTEL 8
I-75 at State Rd. 47 (Exit 81) - Route 14, Box 604
LAKE CITY, FLORIDA 32024 - TELE. (904) 752-8933

ROOM	DATE	AMT. PAID	CLERK

THIS IS YOUR RECEIPT - THANK YOU

Item No. 7: Chevron credit card application card, obtained from Hunter Food Store #47 at Hwy. 47 and I-75, listing Lake City address (both sides)



Chevron

For your free credit card, call:

1 800 FREE APP

(1 - 8 0 0 - 3 7 3 - 3 2 7 7)

See back for details.

Call for the card today.

Simply call 1 800 FREE APP for an over-the-phone, 3-minute application. Upon credit approval, you can have a Chevron credit card in your wallet in just three days.

HUNTER FOOD STORE #47

HWY. 47 & I-75

LAKE CITY, FLORIDA

STATION I.D. # 42084

Dealer stamp/Station number

CCE-4 (11/97)

Item No. 8: Panoramic photograph of service stations located at I-75/State Road 47: Chevron Food Mart, gas station and Little Caesar's Restaurant on left; Amoco gas station and convenience store in center; Rally convenience store, Express gas station and Subway Restaurant on right



- Item No. 9: Photograph of Stop-n-Go food store and service station co-located with T-Roy's Restaurant and Motel 8, all approximately 1/5 mile from I-75/State Road 47 Interchange



- Item No. 10: Photograph of T-Roy's Restaurant, with co-located Motel 8 in background

